FROM INAME & LOCATION

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| 9476 | January 5, 1971 | " Messrs. |
|-----------|---|--|
| \$U##ET | STATUS OF PROGRAM FOR AROCLOR POLLUTION | G. L. Bratsch C. F. Buckley/M. R. Foresman B. W. Corlew |
| AFFERENCE | CONTROL | P. E. Heisler |
| то | Mr. J. R. Savage - G.O. | P. B. Hodges - G.O. D. W. Jackson W. A. Krull R. M. McCutchan F. McDonald - Newport A. L. Rasmussen W. R. Richard - G.O. J. Corder - Anniston B. Young |

This is the January 1, 1971 status of PCB pollution control program.

I. PCB Levels in Sewer:

A. Aroclor losses from the Aroclor Department averaged about 0.6 lbs/day and ranged from about 0.2 to 1.4 lbs/day.

Losses from the treatment plant for the period 11/17-12/17 averaged 34 lbs/day (177 ppb). Range for 7 samples was 9 to 53 lbs/day (47-280 ppb). Samples taken during the 3 day neutralization test (12/15-12/17) are not included. Average for this period was 27 lbs/day.

- B. Program to monitor the various plant sewers was begun the last week of December. Plans are to composite samples twice per week for analysis.
- C. Sewer samples were taken from the effluents of the other industrial plants. These included:

| Midwest Rubber | 9 ppb |
|----------------------|----------|
| American Zinc | 6 ppb |
| Cerro Copper & Brass | 9 ppb |
| Mobil Oil | 54 ppb |
| Dead Creek | 18 ppb |
| Village | 2110 ppb |

The only significant quantity is the PCB's from the Village sewer. This amounts to about 2 to 3 lbs/day. Probable source is Aroclor trailer washes at Rogers Terminal.

II. Projects to Reduce Sewered PCB's from Aroclor Department

A. Design package for project to pave and trench loading areas is 95% complete and will be issued by 1/15/71.

CER 098488

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Mr. J. R. Savage - G.O. Status of Program for Aroclor Pollution Control Page 2 1/5/71 WGK

IM: Program to Eliminate Sewered PCB's from Using Departments

Jerry Bratsch has requested by memo that all General Superintendents proceed at once to change out all therminol units to non-Aroclor heat transfer fluids.

IV. Removal of Soluble PCB's from Sewer Stream (Reach 10 ppb)

A 3 day test was run 12/15-12/17 in which the entire plant effluent was neutralized with lime. Results indicated no change in the average level of PCB's in either the influent or the effluent at the treatment plant at the 90% confidence level.

At this point, it appears possible to reach the goal of 10 ppb without secondary or tertiary treatment by doing the following:

- Change out of all plant therminol units to non-Aroclor fluids.
- Continue control of losses at the Aroclor Department at less than 1.5 lbs/day.
- 3. Clean all contaminated sewers and sewer boxes.
- 4. Monitor and control Rogers Terminal.

V. PCB Levels in the Atmosphere

A project premise and estimate for \$6,000 were prepared to replace the nitrogen purge with a nitrogen blanket at the mix tanks and to reroute the chlorinator rupture disclinea to the pad.

A sampling station will be shared with the chlorine department to monitor PCB content of air downwind from the Aroclor Department. Samples will be taken every other week starting the week of 1/11/71.

VI. PCB Rework Project (Est. 2095)

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CER 098489

Project package is essentially complete and will be issued the week of 1/4/71.

W. C. Engman Technical Services Dept.

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CONFIDENTIAL 92-CV-204-WDS

July 10, 1970

cc. Messrs. J. C. Hume

D. W. Jackson

S. H. Jackson

D. H. MacDonald

D. L. Walker

REFERENCE

PROGRAM FOR AROCLOR
POLLUTION CONTROL
W. C. Engman Memo, 6/26/70

TO

Mr. W. C. Engman

Per your request for our program to eliminate sewered PCB's from using departments, the following pertains to Dept. 255 (4-NDPA):

1. Therminol heater charging system - install tank/pump/piping to eliminate present drum man-handling approach. System would be used for both existing and new (CEA 2122) therminol heaters. Primary justification would be safety via improved drum handling, but insurance against a drum spill would also be provided. Plans are as follows:

(Dennis Walker responsible)

Submit project premise .
Submit estimate
Issue Jesign package

EDC 8/1 8/15 2 Months after estimate

- 2. Draining spent Therminol physical facilities are considered to be adequate for existing unit. Plans in conjunction with CEA 2122 include ability to collect spent material from both heaters for disposal in the proposed plant incinerator (see attached memo). This need, plus that in other using departments, could probably justify a plant trailer for collection of spent materials.
- 3. Pump leaks and spills in Therminol handling area CED is committed (per Dave Macdonald) to complying with the plant requirements in this area (see attached memo). Timing on this installation is 4th Quarter, 1970.

R. M. Fabian

Technical Services Dept.

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IN-10, MEY 11 69

Att. W. = Framer or ()

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